# **Privacy Policy Declaration**

Our company understands the importance of protecting personal information and complies with the Act on the Protection of Personal Information (Personal Information Protection Act) and other related laws, regulations, and guidelines. We handle personal information appropriately and take proper measures for safety management. We will address complaints appropriately and ensure thorough education and guidance for our officers and employees to handle personal information with utmost care.

#### 1. Business Information

Corporate Name: Sun Arrows Investment Co., Ltd.

Address: 6th Floor, 77 Ginza Building, 4-14-11 Ginza, Chuo-ku, Tokyo

Representative: President and CEO Kengo Tsuchida

## 2. Acquisition of Personal Information

Our company acquires personal information through lawful and fair means within the scope necessary to achieve the purposes described in "3. Purpose of Use of Personal Information" below (hereinafter referred to as "Purpose of Use"). We do not acquire personal information through false or other improper means.

## 3. Purpose of Use of Personal Information

Our company uses customers' personal information within the scope necessary for the following purposes in financial instruments business (investment advisory/agency business, Type II financial instruments business), real estate transactions, and related or ancillary operations. We may change the Purpose of Use within a reasonably recognized scope of relevance, and any changes will be announced through methods such as posting on our website.

- (1) To perform administrative tasks related to transactions under the Financial Instruments and Exchange Act and real estate transactions.
- (2) To perform operations related or ancillary to the above transactions.
- (3) To confirm the identity of the customer or their representative.
- (4) To appropriately and smoothly fulfill transactions with customers.

#### 4. Provision of Personal Information to Third Parties

Our company does not provide personal information to third parties without the consent of the individual, except in the following cases:

- (1) When required by law.
- (2) When necessary to protect human life, body, or property, and obtaining the individual's consent is difficult.
- (3) When particularly necessary to improve public health or promote the sound upbringing of children, and obtaining the individual's consent is difficult.
- (4) When necessary to cooperate with national institutions, local governments, or their entrusted parties in performing legally prescribed duties, and obtaining the individual's consent may hinder

the performance of such duties.

(5) When providing personal information to third parties in accordance with procedures stipulated

by the Personal Information Protection Act.

(6) When outsourcing all or part of the handling of personal information to contractors within the

scope necessary to achieve the Purpose of Use, with appropriate management and supervision.

5. Safety Management Measures for Personal Information

Our company strives to keep personal information accurate and up-to-date. We implement

necessary and appropriate safety management measures to prevent leakage, loss, or damage of

personal information and ensure its security.

6. Continuous Improvement of Privacy Policy

To ensure the proper handling of personal information, our company will review this privacy policy

as needed, considering changes in social demands, and take continuous improvement measures.

7. Contact for Complaints and Inquiries Regarding Personal Information Handling

For questions, disclosure, correction, suspension of use, complaints, or inquiries regarding the

handling of personal information, please contact the following:

Address: 6th Floor, 77 Ginza Building, 4-14-11 Ginza, Chuo-ku, Tokyo, 104-0061

Sun Arrows Investment Co., Ltd., Management Department

Phone: 03-6264-7610

Reception Hours: 9:30 AM to 5:45 PM (excluding weekends, holidays, and company-designated

holidays)

Our company is a member (target business operator) of the Japan Investment Advisers Association,

a certified personal information protection organization. The association's complaint consultation

office handles complaints and inquiries regarding the handling of personal information by its

members.

Japan Investment Advisers Association Secretariat Complaint Consultation Office (Personal

Information Department)

Address: 7th Floor, Tokyo Securities Building, 1-5-8 Nihonbashi Kayabacho, Chuo-ku, Tokyo, 103-

0025

Phone: 03-3663-0505

Reception Hours: Monday to Friday (excluding holidays) 9:00 AM to 5:00 PM

If you need further assistance or clarification, please feel free to ask.